

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JUAN MORGAN,)	
Plaintiff,)	
)	
v.)	Civ. No.: 05-989(RCL)
)	ECF
MIKE JOHANNNS,)	
Secretary, Dept. of Agriculture,)	
)	
Defendant.)	
_____)	

**DEFENDANT’S CONSENT MOTION FOR AN EXTENSION OF
TIME**

Pursuant to Fed. R. Civ. P. 6(b), Defendant Mike Johanns, Secretary, U.S. Department of Agriculture, in his official capacity, respectfully moves the Court for a 60-day extension of deadlines. Pursuant to Local Rule 7(m), the undersigned conferred with Plaintiff’s counsel (Mr. John McHugh) and counsel consented to this motion. Although Mr. McHugh is Plaintiff’s counsel, he is not admitted in this jurisdiction and has not made an appearance in this matter.

There is good cause to grant this Motion. It appears that Plaintiff is still in the process of seeking local counsel to represent him in this litigation. Furthermore, the parties have exchanged correspondence to find an informal resolution to this matter short of further litigation. In fact, Plaintiff has made a settlement demand and Defendant is currently reviewing that demand and intends to respond to the demand shortly.

For these reasons, the Court should grant this consent motion and extend all deadlines as follows:

Events	Current Deadlines	Proposed Deadlines
Discovery	November 13, 2006	January 13, 2007
Dispositive Motions	December 10, 2006,	February 10, 2007
Oppositions	January 11, 2007	March 11, 2007
Replies	February 23, 2007	April 23, 2007

Dated: November 8, 2006.

Respectfully Submitted,

/s/ Jeffrey A. Taylor
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United States Attorney

/s/ Rudolph Contreras
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Defendant.)	
_____)	

ORDER

Upon consideration of Defendant's Consent Motion for an Extension of Time and the entire record herein, it is this _____ day of _____, 200____,

ORDERED that Defendant's Consent Motion for an Extension of Time be and is hereby GRANTED; and it is

FURTHER ORDERED that all deadlines shall be EXTENDED as follows:

Events	Deadlines
Discovery	January 13, 2007
Dispositive Motions	February 10, 2007
Oppositions	March 11, 2007
Replies	April 23, 2007

SO ORDERED.

U.S. District Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on November 8, 2006, service of the foregoing
Defendant's Motion for Extension of Time was made via the Court's Electronic Case Filing
System and by first class, postage prepaid mail to *pro se* plaintiff and his counsel addressed as
follows:

Juan Morgan
Pro se Plaintiff
PSC 2, Box 2814
APO AA 34002

John F. McHugh, Esq.
6 Water Street
New York City, NY 10004

/s/
JOHN C. TRUONG
Assistant United States Attorney